

## **Issues Related to Historic Resources**

A Program Environmental Impact Report was made available for a 45-day public review beginning May 31, 2016. Public review comments and responses to comments addressing the Environmental Impact Report are in the Final Environmental Impact Report. Public comments that specifically pertained to historic resources, their identification and preservation, and proposed regulations for potential historic districts which were received during Environmental Impact Report public review period are addressed below by topic.

### ***Timing of Intensive Survey and Processing of all Potential Historic Districts***

Designation of historic districts require additional, intensive level survey work documenting the history and significance of the district, as well as construction history of every property within the district. In addition, district processing procedures require property owner workshops and multiple public hearings. It is not feasible to complete this work for the potential historic districts in time for the adoption hearings for the CPUs. However, the City is developing a multi-year work program to prioritize and schedule processing of the historic districts. In the interim, the proposed supplemental regulations will provide protections to potential contributing resources not currently afforded by the existing regulations.

### ***Proposed Supplemental Regulations for Potential Historic Districts vs Review for Consistency with the US Secretary of the Interior's Standards for the Treatment of Historic Properties***

In developing the proposed supplemental regulations for the potential historic districts, it is the City's desire to provide straight-forward, clear and universal requirements that provide adequate protection of potential historic districts and preserve their eligibility for future designation. In addition, because the significance of the districts has not been definitively established through intensive survey evaluation and designation, the City believes it is inappropriate to apply the same requirements and standards to contributing properties to potential historic districts that would be applied to designated historic properties (U.S. Secretary of the Interior's Standards).

### ***Municipal Code Requirements for Window Replacements***

The Municipal Code currently requires permits for most window replacements, except replacement of windows in single family and duplex development that does not impact the opening or weather-resistive barrier. In addition, any and all window modifications to designated historic resources requires a permit. Modifying the Code to require permits for window replacements of any kind for all properties has far-reaching, citywide implications beyond the CPU areas. Therefore, it is more appropriate to consider this request as part of a future update to the Land Development Code.

### ***LGBTQ History and Resources within North Park and Golden Hill***

The Historic Context Statements for North Park and Golden Hill have been complete since 2011, and cannot be further refined or updated at this juncture. The City is currently undertaking a separate Historic Context Statement addressing LGBTQ history and historic resources City-wide. This effort will initially conclude in mid-fall. Once complete, this document will be used by City staff and members of the public to assist in the identification and evaluation of LGBTQ resources citywide, including North Park and Golden Hill.

### ***Bungalow/Apartment Court Multiple Property Listings***

The City has received input that the new supplemental regulations for potential historic districts should be applied to the Bungalow/Apartment Court Multiple Property Listings (MPL). However, an MPL is not a historic district, but rather a collection of individual properties with a shared theme and context, and are therefore adequately protected through the City's existing regulations for potential historic resources. Additionally, the supplemental regulations would not provide the protection desired by the community due to the resource type and configuration. The City has also received input that the Bungalow/Apartment Court MPLs should be cross-referenced and linked across planning area boundaries. Any future MPL for Bungalow/Apartment Courts will address the resource as a property type city-wide, and will not be limited by planning area boundaries. Once the context and statement of significance is developed and the MPL established, any Bungalow/Apartment Court in the City will be able to be evaluated and potentially designated under that MPL.